

MATTHEW Q. CALLISTER, ESQ.
Nevada Bar No.: 1396
mqc@callcallyster.com
MITCHELL S. BISSON, ESQ.
Nevada Bar No.: 11920
mbisson@callcallyster.com
CALLISTER LAW GROUP
330 E. Charleston Blvd., Suite 100
Las Vegas, NV 89104
Tel.: (702) 385-3343
Fax: (702) 385-2899
Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

RUDY RIVERA, an individual,

Plaintiff,

vs.

DANIEL BOGDEN, et. al.,

Defendants.

Case No.: 2:17-cv-02776-JCM-NJK

**STIPULATION AND ORDER TO
EXTEND THE DEADLINE TO
RESPOND TO DEFENDANTS' MOTION
FOR SUMMARY JUDGMENT**

(First Request)

COMES NOW, Plaintiff RUDY RIVERA, by and through his counsel of record Mitchell S. Bisson, Esq. of the Callister Law Group, and Defendant CORRECTIONS CORPORATION OF AMERICA ("CoreCivic"), by and through its counsel of record Jacob. B. Lee, Esq. of Struck Love Bojanowski & Acedo, PLC, and hereby respectfully submit this Stipulation and Order to Extend the Deadline to Respond to Defendants' Motion for Summary Judgment (the "Stipulation"). This Stipulation is made in accordance with LR IA 6-1, LR IA 6-2, LR 7-1, and LR 26-4 of the Local Rules of this Court. This is the first request for an extension of time to file the Plaintiff's response Opposition to Defendants' Motion for Summary Judgment and subsequent Reply from Defendant.

Defendants filed the Motion for Summary Judgment [Dkt. 47] on May 3, 2019 and Plaintiffs' response is currently due May 24, 2019. The instant extension is requested because Plaintiffs' counsel unexpectedly had a trial run three days longer than expected, and as a result,

requires additional time to prepare the response Opposition to Defendants' Motion. This request for an extension of time is not sought for any improper purpose or other purpose of delay. It is further requested that the deadline to file Defendant's Reply be extended as well.

Upon agreement by and between all parties hereto as set forth herein, the undersigned respectfully requests this Court grant an extension of time, up to and including May 29, 2019, for Plaintiff to file an Opposition to Defendants' Motion to Dismiss [Dkt. 47], and to grant an extension of time, up to and including June 14, 2019 for Defendant to file a Reply to Plaintiff's response Opposition.

DATED this 24th day of May, 2019.

CALLISTER LAW GROUP

/s/ Mitchell S. Bisson

Matthew Q. Callister, Esq.
Nevada Bar No.: 1396
Mitchell S. Bisson, Esq.
Nevada Bar No.: 11920
Callister Law Group
330 E. Charleston Blvd., Suite 100
Las Vegas, NV 89104
Attorneys for Plaintiff

DATED this 24th day of May, 2019.

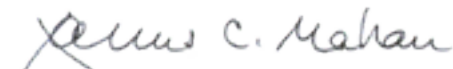
**STRUCK LOVE BOJANOWSKI &
ACEDO, PLC**

/s/ Jacob B. Lee

Rachel Love, Esq.
Jacob B. Lee, Esq.
3100 West Ray Road, Suite 300
Chandler, Arizona 85226
RLove@strucklove.com
JLee@strucklove.com
*Attorneys for Defendant
Corrections Corporation of America-
CoreCivic*

ORDER

IT IS SO ORDERED.


UNITED STATES DISTRICT COURT JUDGE

Dated: May 29, 2019